

WEIL, GOTSHAL & MANGES LLP

Stephen Karotkin (*pro hac vice*)
(stephen.karotkin@weil.com)

Jessica Liou (*pro hac vice*)
(jessica.liou@weil.com)

Matthew Goren (*pro hac vice*)
(matthew.goren@weil.com)

New York, NY 10153-0119

Tel: (212) 310-8000

Fax: (212) 310-8007

KELLER & BENVENUTTI LLP

Tobias S. Keller (#151445)
(tkeller@kellerbenvenutti.com)

Jane Kim (#298192)
(jkim@kellerbenvenutti.com)
650 California Street, Suite 1900
San Francisco, CA 94108

Tel: (415) 496-6723

Fax: (415) 636-9251

*Proposed Attorneys for Debtors
and Debtors in Possession*

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

☐ Affects PG&E Corporation

☐ Affects Pacific Gas and Electric Company

☒ Affects both Debtors

**All papers shall be filed in the Lead Case, No.
19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**STIPULATION BETWEEN DEBTORS AND
AD HOC COMMITTEE OF SENIOR
UNSECURED NOTEHOLDERS OF
PACIFIC GAS AND ELECTRIC CO.
EXTENDING TIME TO RESPOND TO NOL
MOTION TO BE HEARD ON FEBRUARY
27, 2019**

[No Hearing Requested]

STIPULATION TO EXTEND TIME FOR AD HOC COMMITTEE OF SENIOR UNSECURED NOTEHOLDERS TO
RESPOND TO NOL MOTION

1 This stipulation and agreement for order (“Stipulation and Agreement for Order”) is entered
2 into by and between PG&E Corporation (“PG&E Corp.”) and Pacific Gas and Electric Company (the
3 “Utility”), as debtors and debtors in possession (collectively, the “Debtors”) and the Ad Hoc
4 Committee of Senior Unsecured Noteholders of Pacific Gas and Electric Co. (the “Ad Hoc Committee
5 of Senior Unsecured Noteholders”). The Debtors and the Ad Hoc Committee of Senior Unsecured
6 Noteholders are referred to in this Stipulation and Agreement for Order collectively as the “Parties,”
7 and each as a “Party.” The Parties hereby stipulate and agree as follows:

8 **RECITALS**

9
10 A. On February 6, 2019, the Debtors filed a notice of hearing [Dkt. 353] noticing for a
11 hearing before the Court at 9:30 a.m. on February 27, 2019, among other things, the *Motion of Debtors*
12 *Pursuant to 11 U.S.C. §§ 105(a) and 362 for Interim and Final Orders Establishing Procedures and*
13 *Approving Restrictions on Certain Transfer of Stock of, and Claims Against, the Debtors* [Dkt. 10] (the
14 “NOL Motion”).

15
16 B. Under Local Bankruptcy Rule 9014-1(c)(2), any opposition or response to the NOL
17 Motion must be filed and served on counsel for the Debtors no later than February 20, 2019.

18
19 C. On February 20, 2019, counsel for the Ad Hoc Committee of Senior Unsecured
20 Noteholders requested, and proposed counsel for the Debtors agreed, that the time for the Ad Hoc
21 Committee of Senior Unsecured Noteholders to respond to the NOL Motion be extended by two days.

22 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**
23 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**
24 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**
25 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER,**
26 **THAT:**

27 1. The time for the Ad Hoc Committee of Senior Unsecured Noteholders to file and serve
28 any response or opposition to the NOL Motion be extended up to and including 4:00 p.m. (Pacific
Standard Time) on February 22, 2019.

STIPULATION TO EXTEND TIME FOR AD HOC COMMITTEE OF SENIOR UNSECURED NOTEHOLDERS TO
RESPOND TO NOL MOTION

1
2
3 Dated: February 21, 2019

4 KELLER & BENVENUTTI LLP

5 By /s/ Jane Kim
Jane Kim

6 *Proposed Attorneys for Debtors*
7 *and Debtors in Possession*

Dated: February 21, 2019

AKIN GUMP STRAUSS HAUER & FELD LLP

By /s/ Ashley Vinson Crawford
Ashley Vinson Crawford

Counsel to the Ad Hoc Committee of Senior
Unsecured Noteholders of Pacific Gas and
Electric Company